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Hearing Date: April 20, 2022
Hearing Time: 10:00 a.m. (EST)
Objections Due: April 6, 2022

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

JOHN FUJIWARA *et al.*,

Defendants.

Adv. Pro. No. 10-04289 (CGM)

NOTICE OF MOTION TO REOPEN ADVERSARY PROCEEDING

PLEASE TAKE NOTICE that Irving H. Picard, trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, (“SIPA”) and the chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, filed the motion (the “Motion”) to reopen adversary proceeding. The Motion will be heard before the Honorable Cecelia G. Morris, United States Bankruptcy Judge for the United States Bankruptcy Court, Southern District of New York, on **April 20, 2022, at 10:00 a.m.** (the “Hearing”), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court’s directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing must refer to Judge Morris’ guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451–6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court’s website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>. Pro se parties may participate telephonically in hearings free of charge.

PLEASE TAKE FURTHER NOTICE that any objection to the Motion (“Objection”) shall: (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules, and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the Objection(s) and specific grounds therefor; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service; (v) be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Nicholas J. Cremona, Esq.; and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite

1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, Esq., so as to be received no later than April 6, 2022.

PLEASE TAKE FURTHER NOTICE that failure to timely file an Objection may result in the entry of an order granting the relief requested in the Motion without further notice to any party or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that the Trustee shall file a reply, if any, by no later than April 13, 2022.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Date: March 23, 2022

BAKER & HOSTETLER LLP

By: /s/Nicholas J. Cremona

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Liquidation of Bernard L. Madoff Investment
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